

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
JOANN INC., et al.¹) Case No. 25-10068 (CTG)
Debtors.) (Jointly Administered)
)
) **Re: Docket No. 475**

**CERTIFICATION OF COUNSEL REGARDING
MOTION OF DEBTORS SEEKING ENTRY OF AN ORDER**

**(I) SETTING BAR DATES FOR FILING PROOFS OF CLAIM, INCLUDING
UNDER SECTION 503(B)(9), (II) ESTABLISHING AMENDED SCHEDULES BAR
DATE AND REJECTION DAMAGES BAR DATE, (III) APPROVING THE FORM OF
AND MANNER FOR FILING PROOFS OF CLAIM, INCLUDING SECTION 503(B)(9)
REQUESTS, AND (IV) APPROVING FORM AND MANNER OF NOTICE THEREOF**

The undersigned counsel to Joann, Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On February 20, 2025, the *Motion of Debtors for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Form and Manner of Notice Thereof* [Docket No. 475] (the “Motion”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Bar Date Order”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

2. A hearing on the Motion was set to be held on March 6, 2025, at 2:00 p.m. (prevailing Eastern Time) and any objections or responses to entry of the Bar Date Order were to be filed and served on the undersigned proposed counsel by February 27, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”), except for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) whose deadline was extended to March 4, 2025 at 4:00 p.m. (prevailing Eastern Time).

3. Prior to the Objection Deadline, the Debtors received informal comments to the proposed Bar Date Order from counsel to the Prepetition Term Loan Lenders, counsel to certain of the Debtors’ landlords, and the U.S. Trustee. The Debtors have not received any objections or other informal comments to the Motion or proposed Bar Date Order.

4. The Debtors revised the proposed Bar Date Order to address the informal comments received from counsel to the Prepetition Term Loan Lenders, counsel to certain of the Debtors’ landlords, and the U.S. Trustee, and the parties agreed to a revised Bar Date Order, a copy of which is attached hereto as Exhibit 1 (the “Revised Bar Date Order”).

5. A blackline comparing the Revised Bar Date Order against the Bar Date Order is attached hereto as Exhibit 2.

6. The Debtors respectfully request that the Court enter the Revised Bar Date Order at its earliest convenience.

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Dated: March 5, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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